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January 29, 2016

U.S. District Judge Kiyo Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: United States v. Evan Greebel, 15 CR 637 (KAM)

Dear Judge Matsumoto:

Pursuant to the Court's January 26, 2016 Order, I respectfully write to request permission for my client, Evan Greebel, to travel on three trips with his wife and three young children in February and March 2016. Each of the trips described below was planned and paid for prior to Mr. Greebel's arrest on December 17, 2015. The government and Pre-Trial Services do not object to this request.

First, Mr. Greebel requests permission to travel to Vermont for two weekends with his wife and children. The first trip is scheduled on the weekend of February 5, 2016 to February 7, 2016. The second trip is scheduled on the weekend of March 25, 2016 to March 27, 2016. On each occasion, the family will drive to Manchester and stay in a local hotel.

Second, Mr. Greebel requests permission to travel with his wife and children to the Miami-Fort Lauderdale-West Palm Beach, Florida metropolitan area from February 10, 2016 to February 22, 2016. The main purpose of this trip is for Mr. Greebel and his family to spend time with Mr. Greebel's parents. Mr. Greebel also plans to drive his family to Orlando, Florida, where they will stay in a hotel from February 15, 2016 to February 18, 2016. Mr. Greebel plans to stay at his parents' home in Florida on the remaining dates.

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We believe that the requested travel is appropriate. Mr. Greebel was born and raised in Westchester County and now lives in the same community where he grew up. Mr. Greebel does not pose a risk of flight in light of his and his family's substantial personal and professional ties to the greater New York City area, together with the \$1 million appearance bond secured by the equity in his home and co-signed by his wife and mother. Mr. Greebel hopes that going on the previously scheduled trips described above will help avoid further disruption to his children.

Assistant United States Attorney Alixandra Smith has informed us that the government does not object to the proposed travel described above. Mr. Greebel's Pre-Trial Services officer, Mr. Vincent Adams of PTS in the Southern District of New York, has likewise been advised of the requested travel, and Mr. Adams said that PTS does not object to these travel requests.

We appreciate Your Honor's consideration of these requests.

Respectfully submitted,



Jonathan S. Sack

cc: AUSA Winston Paes, AUSA Alixandra Smith (via ECF)
Mr. Vincent Adams (Pre-trial Services, SDNY)
Mr. Robert Long (Pre-trial Services, EDNY)